

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
(Eastern Division)

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CHARLES C. JOHNSON and  
GOT NEWS, LLC

Plaintiffs,

v.

GAWKER MEDIA, LLC, J.K. TROTTER,  
and GREG HOWARD

Defendants.

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Case No. 14:15-cv-01137  
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**DECLARATION OF COURTENAY O'CONNOR**

I, COURTENAY O'CONNOR, declare as follows:

1. I am employed as Deputy General Counsel by Gawker Media, LLC, a defendant in this action. I am competent to testify as to the facts set forth below, and, if called as a witness, could and would testify to such facts based on personal knowledge and under oath.

2. Gawker Media, LLC operates its websites from its offices in New York City, New York.

3. Gawker Media, LLC does not send any tangible products into Missouri and does not have any paid subscription agreements with any Missouri internet users.

4. Two of Gawker Media, LLC's websites published the allegedly defamatory articles that are the subject of this matter. Gawker.com published the articles written by defendant J.K. Trotter. Deadspin.com published the article written by defendant Greg Howard. These websites are available to internet users in Missouri just as they are available to any internet user anywhere in the world.

5. A single employee of Gawker Media, LLC telecommutes to New York City, New York from his home in Kansas City, Missouri. That employee is not a part of Gawker's editorial team and had no role in reporting the articles subject to this suit.

6. Gawker Media, LLC has no offices, bank accounts, or other assets, personal or real, in Missouri.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 8/21/15

  
COURTENAY O'CONNOR

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 24th day of August, 2015, a true copy hereof was served with the Clerk of the Court using the CM/ECF system on the following:

Jonathon Christian Burns  
THE BURNS LAW FIRM, LLC  
1717 Park Avenue  
St. Louis, MO 63104  
[john@burns-firm.com](mailto:john@burns-firm.com)

*Attorneys for Plaintiffs*

By: /s/ Joseph E. Martineau